

Before the  
Federal Communications Commission  
Washington, D.C. 20554

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**RECEIVED**  
**DEC 13 1993**  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of ) MM Docket No.  
 )  
Amendment of Section 73.202(b), ) RM-\_\_\_\_\_  
Table of Allotments, )  
FM Broadcast Stations, )  
(Ocean Isle Beach, North Carolina) )

To: Chief, Allocations Branch  
Policy and Rules Division  
Mass Media Bureau

**PETITION FOR RULEMAKING**

Ocean Isle Broadcasting Company ("OIBC"), by and through counsel, and pursuant to §1.420(d) of the Commission's Rules (47 C.F.R. §1.420(d)), hereby submits its "Petition For Rulemaking" seeking the allotment of new FM Channel 228A to Ocean Isle Beach, North Carolina. In support whereof, the following is shown:

1. There are currently no commercial aural services authorized to Ocean Isle Beach, North Carolina. Therefore, the public interest would be served by this proposal, for it would bring a first aural service to that community.

2. Ocean Isle Beach, North Carolina, qualifies as a "community" for allotment purposes. As shown in the attached Exhibit TE-1, it is incorporated and is currently listed in the census data for the State of North Carolina.

See, East Hemet, CA, et. al., 67 RR 2d 146 (1989).

According to a "Land Use Plan - 1990 Update", adopted by the town, its year-round population (1990 Census) within the town limits was 523. See copy of pertinent portions of the

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plan, Exhibit A. This is an 40.6 percent increase over the past five-year period. Id. Its estimated peak seasonal population within the city limits is currently 13,879. Id. Town officials estimate that the year-round population will increase to approximately 620 residents by the year 2000 and that the seasonal population will increase to around 17,403. Id.

3. There are present in Ocean Isle Beach social, economic and cultural elements that further demonstrate that it is a separate community. See, East Hemet, supra, and Rockport, TX, et al., 67 RR 2d 176 (1989). Ocean Isle Beach has its own volunteer fire department, police department and town hall and mayor. See Exhibit A. The town has a self-service ABC store and the Museum of Coastal Carolina. Id. Ocean Isle Beach is an island connected to the mainland via a bridge which is evidence that the residents function and conceive of themselves as members of a separate community, around which their interests coalesce. See, Princeville, HI, et al., 67 RR 2d 644 (1990) and Mighty-Mac Broadcasting Co., 58 RR 2d 599, 603 (1985).

4. Attached hereto, as Exhibit TE-1, is an Engineering Statement in which it is demonstrated that Channel 228A may be allotted to Ocean Isle Beach, North Carolina, in strict accordance<sup>1</sup> with the Commission's spacing and city grade

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<sup>1</sup> The allotment would be short-spaced to WDZD, Channel 228A, Shallotte, North Carolina; however, Jennings Communications Corporation, the licensee of WDZD, holds a construction permit, issued on September 15, 1992, to change

coverage requirements and without any disturbance to the Commission's current FM allotment scheme.

5. Should Channel 228A be allotted to Ocean Isle Beach, OIBC will promptly apply for a construction permit for the facilities and, upon grant, will promptly construct the station.

6. Accordingly, it is proposed that the Commission's FM Table of allotments be amended as follows:

<u>City</u>	<u>Present</u>	<u>Channel No.</u> <u>Proposed</u>
Ocean Isle Beach, NC	---	228A

**WHEREFORE**, it is respectfully requested that a rulemaking proceeding be initiated to allot Channel 228A to Ocean Isle Beach, North Carolina.

Respectfully submitted,

**OCEAN ISLE BROADCASTING COMPANY**

By: 

Gary S. Smithwick  
Shaun A. Maher

Its Attorney

**SMITHWICK & BELENDIUK, P.C.**  
1990 M Street, N.W.  
Suite 510  
Washington, D.C. 20036  
(202) 785-2800

December 13, 1993

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the operating frequency of WDZD to Channel 279C3, clearing OIBC's proposal to allot Channel 228A. See File No. BPH-920515IA.

**EXHIBIT A**

**LAND USE PLAN - 1990 UPDATE**  
**FOR**  
**THE TOWN OF OCEAN ISLE BEACH, NORTH CAROLINA**

**ADOPTED BY**  
**THE TOWN OF OCEAN ISLE BEACH:**  
**MAY 19, 1992**

**ADOPTED BY**  
**THE N.C. COASTAL RESOURCES COMMISSION:**  
**MAY 29, 1992**



**LAND USE PLAN - 1990 UPDATE  
FOR  
THE TOWN OF OCEAN ISLE BEACH, NORTH CAROLINA**

Betty Williamson, Mayor

**Board of Commissioners**

Terry Barbee  
Bill Benton  
Debbie Fox  
Kendall H. Suh  
Janet Sanders

Daisy Ivey, Town Clerk  
Druied Roberson, Building Inspector

**Planning Board**

William Bullington, Jr.  
Ken Proctor  
DeCarol Williamson

**Extraterritorial Area Members**

John D. Frink  
Judy McHenry

**Planning Assistance by:**

McKIM & CREED ENGINEERS, P.A.  
243 North Front Street  
Wilmington, NC 28401  
M&C89041

The preparation of this plan was financed in part through a grant provided by the North Carolina Coastal Management program, through funds provided by the Coastal Zone Management Act of 1972, as amended, which is administered by the Office of Ocean and Coastal Resource Management, National Ocean and Atmospheric Administration.

## **E. Present Population and Economic Data**

Within the town limits there are 523 permanent residents, according to the 1990 U.S. Census of Population. This represents an increase of 41% since the 1986 Plan (estimated to be 372). Within the extraterritorial area, the permanent population consists of 435 persons. This figure is also a product of the 1990 Census (73 blocks in Census Tract 205.03.) Refer to Table 1.

**Table 1**

**Permanent Population, 1986 & 1990  
Ocean Isle Beach Planning Area**

	1986	1990
Inside Corporate Limits	372	523
Extraterritorial Area	<u>n/a</u>	<u>435</u>
Totals	372	958

**Notes**

1. Extraterritorial Area did not exist in 1986

**Sources**

1. 1986 Land Use Plan Update
  2. 1990 Census of Population
-

Ocean Isle's existence is based largely upon second-home ownership and the rental of those dwellings, primarily during the summer months. The summertime population component must be estimated (and projected) in order to realistically predict public facility and service needs such as water supply and police protection. The following Table reflects peak daytime population estimates for the planning area.

**Table 2**  
**Peak Daytime Population Estimates, 1986 & 1990**  
**Ocean Isle Beach Planning Area**

<u>Year</u>	<u>Resident</u>	<u>Day Visitors</u>	<u>Total Peak</u>
<i>Inside Corporate Limits</i>			
1986	13,209	9,980	23,189
1990	13,879	10,492	24,371
<i>Extraterritorial Area</i>			
1986	NA	NA	NA
1990	1,809	403	2,212

Notes

1. "Resident" population includes year-round residents, summer residents, and cottage and motel renters.
2. "Day Visitors" are those persons visiting the beach but not staying overnight.
3. Total peak occupancy is the total daytime population expected to occur on a summer holiday weekend, with favorable weather.
4. Day visitor figures for the extraterritorial area are based upon estimates of persons primarily involved with fishing and boating in the Intracoastal Waterway area. Estimates were determined by taking boat trailer counts at area launch ramps.

Sources

1. 1986 Land Use Plan Update
2. Town of Ocean Isle Beach
3. McKim & Creed Engineers, P.A.



## **2. *Fragile Areas***

Within the Town's planning jurisdiction there exists five types of areas which could easily be damaged or destroyed by inappropriate or poorly planned development. And, conversely, developments within certain of these areas would be perilous to the development itself. The following land areas are considered to be fragile:

- a. coastal wetlands
- b. ocean beaches
- c. estuarine waters and estuarine shorelines
- d. public trust waters
- e. "404" wetlands

## **3. *Resource Potential***

The resource potential existing within the planning area consists of those elements of the environment associated with recreation, tourism, and commercial and sport fishing.

### **I. *Development Constraints: Public Facilities and Services Analysis***

The following is an examination of certain public facilities and services to assist the Town in evaluating its ability to meet present and anticipated demand that will parallel anticipated growth. This section will indicate deficiencies needing future attention and efforts. The plan update will be concerned primarily with:

1. Water Service
2. Wastewater Collection, Treatment and Disposal
3. Roads
4. Solid Waste Disposal
5. Recreation
6. Police Protection
7. Fire Protection
8. Emergency Rescue and Service
9. Town Hall

#### **1. *Water Service***

The current water system service area includes the incorporated area and a small area outside the Town limits along the NC 904 causeway corridor. The Town owns the distribution system and purchases water from the Brunswick County water system. The extraterritorial area is served by the County water system and individual wells. Water consumption within the town varies from a typical low in December of 69,000 gallons per day to a typical high in July of 745,000 gallons per

day. The present capacity of the system is 1600 gallons per minute or 2.3 million gallons per day. Measured on a 24-hour basis, the capacity of the system is three times the peak demand. The water systems do not constitute a constraint to future development.

## **2. *Wastewater Collection, Treatment and Disposal***

The Town has in operation a wastewater system that serves all of the incorporated Town, with the exception of certain areas east of Raleigh Street. East of Raleigh Street, septic tanks remain the only means of wastewater disposal. No area outside of the corporate limits is served by the Town system. It is the policy of the Town to first serve all of the incorporated area before extending service outside of the Town limits. Treatment and disposal consists of lagoons and spray fields. Average daily treatment plant flows range from 67,000 gallons (December 1989) to 489,000 gallons (July 1989). In order to accommodate future growth and/or expansion of the service area, the spray field must be expanded. The present peak flow is 0.68 million gallons per day, compared to the present capacity of 750 gallons per minute. When the present expansion project is completed, the peak capacity will be 1.0 million gallons per day. Therefore the system presently operates at 91 percent capacity at peak periods. After the improvements currently underway are completed, the system will be operating at 68 percent capacity. Approximately 1780 dwellings and businesses are served by the system and approximately 182 (9%) dwellings are not served (within the corporate limits).

The Town is taking steps to improve the system by purchasing approximately 400 acres of adjoining land. An engineering firm has been retained for planning and construction document preparation. Phase II of the system will serve all property owners on the east end of the beach. This facility will not be a constraint to development within the next 5-10 years.

## **3. *Roads***

With the exception of NC Highway 904, First Street, a portion of Second Street (SR 1144) and Shallotte Boulevard (SR 1202), all streets within the incorporated area are Town-maintained. Within the extraterritorial area most roads are State maintained--the balance being privately maintained. The primary traffic congestion problems occur on the NC 904 causeway during Saturdays in the summer season.

The table below shows traffic counts for NC 904 near the Odell Williamson Bridge for 1986, 1989 and projections for 2005.

**Table 9**  
**Traffic Counts and Projections - NC 904**

<u>Year</u> <u>Adjustment</u>	<u>Average Daily</u> <u>Traffic Count (ADT)</u>	<u>Seasonal</u>
1986	6,050 (actual count)	7,562
1989	5,800 (actual count)	7,250
2005	10,100 (projection)	12,625

Source

1. NC Department of Transportation
  2. Based upon traffic counts taken on NC 904 north of the Williamson Bridge.
- 

The Odell Williamson high-rise bridge over the Intracoastal Waterway was dedicated in November, 1985, replacing a low level swing bridge that frequently interrupted traffic flow, particularly during the summer season. The Town recognizes that inadequate off-street parking is a problem. Saturday morning rental unit check outs create traffic problems on the Causeway.

4. *Solid Waste Disposal*

The Town utilizes a private contractor for solid waste collection and hauling to the Brunswick County Landfill. The landfill, located on Galloway Road, is currently expected to last until 1995-96. The Town, along with Brunswick County are in compliance with present provisions of NC Senate Bill 111. Solid waste collection and disposal services do not present a constraint to development.

5. *Recreation*

The existing Town park on Second Street containing tennis courts is currently being upgraded. The Museum of Coastal Carolina, a privately funded museum open to the public was completed in 1990 and is also located on Second Street. The Town has a wealth of "natural" recreational facilities for swimming, fishing, boating, etc., but Town staff and officials remain mindful of the need for traditional facilities for residents and visitors. To capitalize on the beach frontage, the Town provides and maintains 23 public beach access points with 353 permanent and 300 temporary parking spaces along the strand. Lifeguard service is not provided.

6. *Police Protection*

The Town's police force currently consists of an authorization of six full-time officers plus the chief of police. This level of police staffing appears to be adequate for the present. However, with the steady increase in building and tourism being witnessed, additional personnel will most likely be required during the planning period. This service does not present a constraint to development.

7. *Fire Protection*

The Town's volunteer fire department consists of about 25 volunteers and is equipped with the following inventory:

- 1988 F-700 Ford diesel truck with 1500 gallon tank and 350 gpm pump.
- 1976 F-800 Ford gasoline truck with 250 gallon tank and 100 gpm pump.
- 1972 American La France 90' Aero Chief diesel truck with 1250 gpm pump (Boom truck).
- 1979 K-5 Blazer 4-wheel drive emergency vehicle.
- 16 foot inflatable Zodiac boat with 25 hp Mercury motor and trailer.

The Town's fire department also provides protection to most of the extraterritorial area, with the exception of the western portion of the area, which is served by the Sunset Beach Department. The current rating for the department is 8, an improvement over the rating of 9 experienced at the last plan update. The Town's fire department and police department have trained water rescue personnel on staff. This service is not a constraint to development.

8. *Emergency Rescue and Safety*

Emergency medical rescue services are provided to Ocean Isle Beach by rescue squads in Shallotte (about seven miles away) and in Calabash (about ten miles away). Brunswick County is currently implementing a program that will provide paid EMS personnel supplemented with volunteers. Brunswick County is also implementing a county-wide house numbering and 911 emergency telephone service (to be completed in 1992). This service is not a constraint to development.

9. *Town Hall*

A new town hall with 4,300 square feet of floor area was completed in 1988, giving the Town an attractive, spacious building on Third Street, one-half block west of NC 904. Housed within the hall are all of the Town's administrative functions and the police department. Public meetings for Commissioners, Planning Board, etc. are held in this building. This facility does not constitute a constraint during the next planning period.

Tables 1 and 2 and the accompanying text shows figures for both the planning area's permanent population and the estimated peak population. The preceding discussion of community facilities and services is based upon a consideration of these figures -- figures that can increase at certain times of the year at least 47 times. It is also important to note that approximately 41 percent of the total peak population consists of day visitors.

Certain community facilities and services such as water and sewage treatment must be designed to meet peak demands. Other services, such as fire protection, are designed to protect a certain amount of development and therefore remain constant. Other services, such as police protection are adjusted by changes in personnel levels to meet the demands of an increased seasonal population.

## SECTION II

### ESTIMATED DEMAND PROJECTIONS AND ANALYSIS

#### A. Population Projections

##### *Estimated Demand*

The current (1990) estimated peak seasonal population, excluding day visitors, for the total planning area is 15,826 persons. By the year 2000 that peak population is projected to be 19,727--an average growth rate of 2.5% per year. The table below shows population figures for 1990 and 2000 for both the incorporated area and the extraterritorial area. A breakdown by population components (year-round, summer, and renters) is also shown.

**Table 10**  
**Population Summary, 1990, 2000**  
**Ocean Isle Beach and Extraterritorial Area**

<u>Population Component</u>	<u>1990 Estimated Population</u>	<u>2000 Projected Population</u>
<i>Inside Corporate Limits</i>		
Year-Round	523	620
Summer Residents	357	444
Cottage and Motel Renters	<u>12,999</u>	<u>16,339</u>
Subtotal	13,879	17,403
<i>Extraterritorial Area</i>		
Year-Round	435	516
Summer Residents	<u>1,512</u>	<u>1,808</u>
Subtotal	<u>1,947</u>	<u>2,324</u>
<b>TOTAL</b>	<u><b>15,826</b></u>	<u><b>19,727</b></u>

##### Source

McKim & Creed Engineers estimates and projections

The basis for the estimates is the assumption of a continuation of the present rate of residential construction (44 dwellings per year) and a continuation of the percentage of dwellings used for permanent residents (9.4%). It should be noted that summer residents within the extraterritorial area typically inhabit their dwellings during weekends and are not usually rented to others. These two characteristics contrast with the Beach's predominant week-long rental patterns.

## **B. Local Objectives Concerning Growth**

The local objective regarding growth of the community is basically to allow quality resort residential development to continue at low to medium densities as long as applicable ordinances are met, the environment is protected and public services are not overburdened. Within the Town, there is a strong orientation to single-family dwellings constructed as a higher-end (financially) product, which, over the past two decades has proven to be recession proof.

## **C. Foreseeable Social and Economic Change**

With regard to social and economic factors, no dramatic changes are foreseen for the next ten years. Trends exhibited during the last five years are predicted to continue. Within the extraterritorial area development (and redevelopment) will most likely proceed at a faster rate than experienced in the past. However, the present mixture of resort residential and related commercial endeavors in the extraterritorial area is expected to continue.

**Table 11**

### **Year-Round (Permanent) Population Figures, 1980-2000 Ocean Isle Beach, North Carolina**

<u>Year</u>	<u>Population</u>	<u>No. Change</u>	<u>% Change</u>
1980 <sup>1</sup>	180	-	-
1985 (Est.) <sup>2</sup>	372	192	107.0%
1990 <sup>1</sup>	523	151	40.6%
2000 (Projection) <sup>3</sup>	620	97	18.5%

#### Sources

1. US Census
2. 1986 Land Use Plan Estimate
3. McKim & Creed Engineers, P.A. projection

### **SECTION III**

#### **POLICY STATEMENTS**

The formulation of specific policies regarding growth, development, and management objectives is perhaps the most important part of any land use plan prepared under the State's Coastal Area Management Act. Because of regulatory requirements, these policies must often strike a delicate balance between desires and objectives of the citizens and the local government of Ocean Isle Beach and the objectives of the CAMA program, as overseen by the Coastal Resources Commission. Land development policies, which should be based on an analysis of existing conditions and projected trends, serve as general guides for effectuating desired development patters. The land use policies also have important interface with local regulations, as well as with State and federal regulations and programs. For example, development permits issued under CAMA must be consistent with the local land use plans. Also, projects supported by state and federal funds must be consistent with the local land use plans, prior to allowing expenditures.

Relevant trends and significant projects that have been witnessed during the past five years include:

- the permanent population has increased significantly (40.6%)
- moderate growth has occurred in single-family residences (104) and multi-family and duplexes (79) units
- the Town adopted an extraterritorial jurisdiction ordinance on May 1, 1990 bringing 1,939 acres and 519 structures under planning and regulatory control
- the Town continues to strengthen its character as a high quality family-oriented beach resort
- the Town continued its public facilities improvement program, including a new town hall, expansion and upgrading of the water and wastewater systems and improving police, fire and emergency medical services
- a continued awareness and concern for local and regional environmental issues
- a new self-service ABC store was completed in the Fall of 1989
- the Museum of Coastal Carolina was constructed in 1990
- the Community Chapel will be completed in 1991





## Simply Breathtaking.

This is the course and the setting no one will ever be able to duplicate. A spectacular 18-hole, Willard Byrd creation fronting the Lockwood Folly River and the Intracoastal Waterway. Here is a layout that challenges every part of your game and imagination. And we're located conveniently between Myrtle Beach and Wilmington at Holden Beach. A perfect addition to your next golf package plans along the Carolina Coast.



**LOCKWOOD  
GOLF LINKS**

401 Club House Dr., Holden Beach, NC 28462

- Homesites from \$27,900  
(919) 842-5500

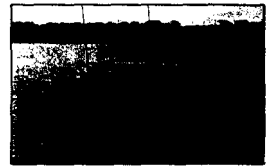
For Starting Times:  
(919) 842-5666

800-443-7891  
(Out of State)

800-537-9043  
(In NC)

(919) 842-5666  
(Local)

## Sunset Beach



Sunset Beach is the southernmost barrier island in North Carolina and spans less than three miles in length. Here, family beach homes are set back behind rows of untouched sand dunes.

Sunset's claim-to-fame is its historical pontoon bridge which allows one lane of traffic at a time and opens periodically for yachts, sailboats and other large vessels to pass through.

The corporate limits begin just outside the island territory where restaurants, specialty shops and championship golf courses are found. Although Sunset's population now numbers more than 600, the island itself is inhabited by about 300 permanent residents.

On the island, fishermen can enjoy a full-service pier. And perhaps one of the most enjoyed activities is strolling along the wide, powder-white strand collecting shells and viewing native wildlife ... nature at its fullest.

## South Brunswick Islands

### Population:

Calabash .....	1210	Sunset Beach .....	311
Ocean Isle Beach .....	523	Holden Beach .....	626
Shallotte .....	965	Varnamtown .....	404

### Total:

Incorporated .....	15,644	Unincorporated .....	35,341
County .....	50,985		

### Population by Township:

Lockwood Folly ..	10,705	Shallotte .....	11,818
Waccamaw .....	2,260		

Source: 1990 U.S. Census of Population

## Climate

The climate in the South Brunswick Islands is usually mild year 'round. Summers are warm, cooled by the sea breezes, with excessive heat a rarity. Winters are pleasant, being short and mild. Spring averages in the 70's with mostly scattered showers occurring infrequently. Autumn brings a water temperature of around 64° and an average air temperature of 74°.

Avg. Air Temp. ....	74°	Overcast Days .....	49
Avg. Water Temp. ....	69°	Rainy Days .....	29
Sunshine Days .....	240	Avg. Rain Fall .....	50"

NEW FM ALLOCATION  
OCEAN ISLE BROADCASTING COMPANY  
OCEAN ISLE BEACH, NORTH CAROLINA  
October 1993

Technical Exhibit  
TE-1

Bromo Communications, Inc.  
P.O. Box 21760 - 1331 Ocean Boulevard, Suite 201  
St. Simons Island, Georgia 31522  
(912) 638-5608

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NEW FM ALLOCATION  
OCEAN ISLE BROADCASTING COMPANY  
OCEAN ISLE BEACH, NORTH CAROLINA  
October 1993

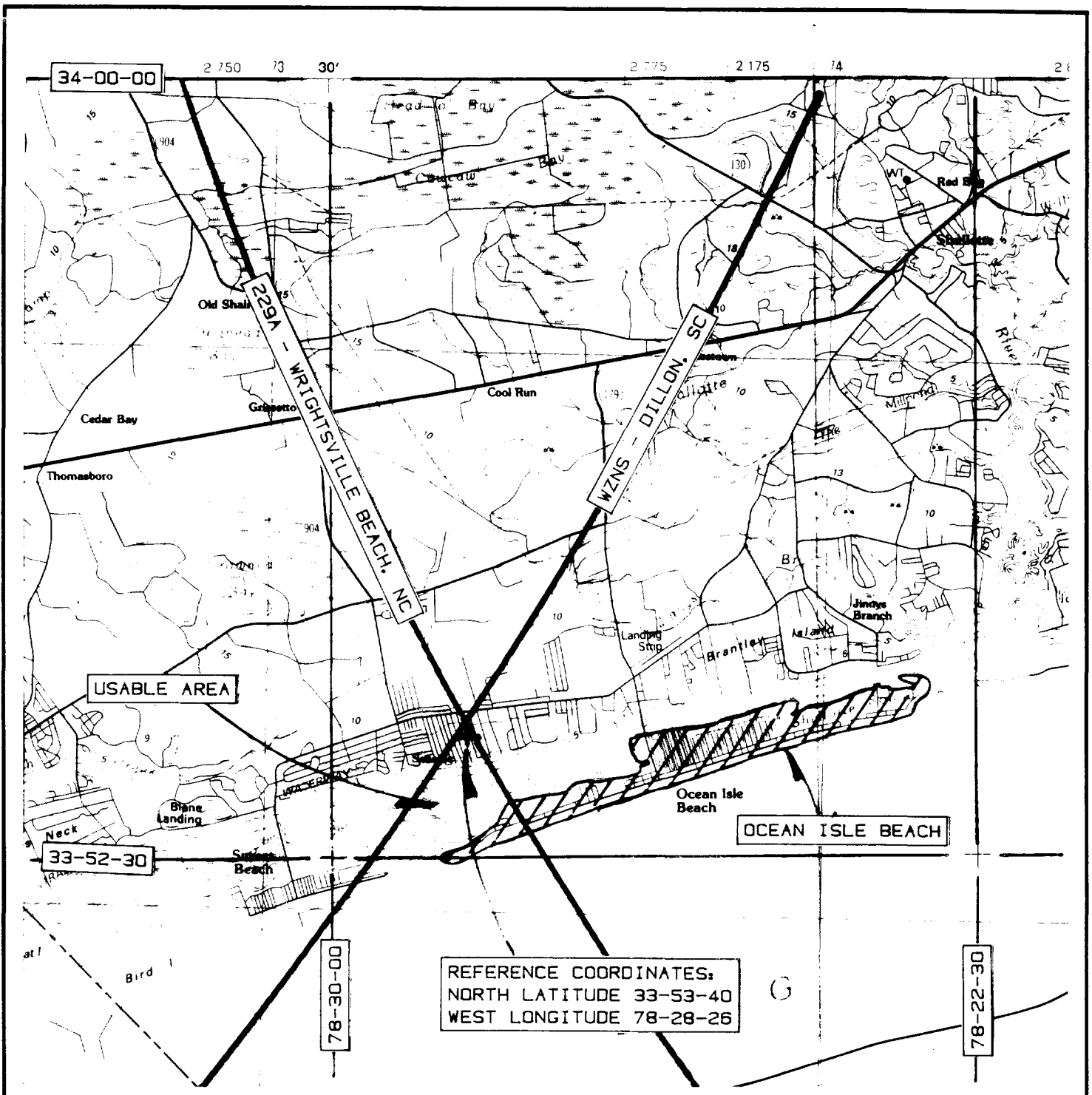
This Technical Exhibit supports the proposal by Ocean Isle Broadcasting Company to allot Channel 228A to Ocean Isle Beach, North Carolina, as its first local Aural Service. Ocean Isle Beach is an incorporated community listed in the census data for the State of North Carolina.

Exhibit #1 is a computerized search printout at reference coordinates North Latitude 33° 52' 36" and West Longitude 78° 28' 41". At these reference coordinates, this proposal is clear under §73.207 spacing rules to all existing and proposed allocations and FM broadcast facilities.

It is noted that the area available to construct a transmitting facility is limited by the allocation reference for Channel 229A in Wrightsville Beach, North Carolina. There are two applications to construct facilities in Wrightsville Beach, both of which are more distant from this proposal than the Wrightsville Beach reference. Upon assignment of the Wrightsville Beach construction permit to one or the other applicant, the area available for the Ocean Isle Beach, Channel 229A, transmitting facility will increase significantly.

After the allotment of Channel 228A to Ocean Isle Beach, North Carolina, Ocean Isle Broadcasting Company promises to timely file an application to construct and operate the broadcast facility.

We have tried to be as accurate as possible in the preparation of this report. Should there be any questions concerning the information continued herein, we welcome the opportunity to discuss the matter by phone at (912) 638-5608.

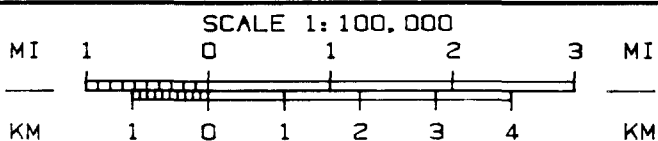


## 228A USABLE AREA

MAP IS A PORTION OF THE USGS 100,000 SCALE  
TOPOGRAPHIC MAP 'MYRTLE BEACH'

## EXHIBIT #1

OCEAN ISLE  
BROADCASTING COMPANY  
NEW FM ALLOCATION  
228A - 93.5 MHz  
OCEAN ISLE BEACH, NC  
OCTOBER 1993



**BROMO** BROADCAST  
COMMUNICATIONS TECHNICAL CONSULTANTS  
St Simons Island, Georgia Washington, D.C.

# BROMO COMMUNICATIONS INC

P.O. Box M - ST SIMONS ISLAND GA 31522

## NEW FM ALLOCATION PROPOSAL OCEAN ISLE BEACH, NORTH CAROLINA

REFERENCE		DISPLAY DATES
33 53 40 N	CLASS A	DATA 08-25-93
78 28 26 W	Current rules spacings	SEARCH 10-18-93
----- CHANNEL 228 - 93.5 MHz -----		

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
WDZD	228A	Shallotte	NC	63.8	7.97	114.5	-106.53 *
LI CN	33 55 34	78 23 48	3.000 kW	91M	4.9	71.2	
Jennings Communications Corpor					BLH7592		
> TO CHANNEL 279C3 PER FCC Release #21472, BPH-9205151A							
ALOPEN	229A	Wrightsville Beach	NC	61.1	71.63	71.5	0.13 <
AL N	34 12 24	77 47 42	0.000 kW	OM	44.5	44.4	
	84-231		WO= 880413				880519
WZNS	225C	Dillon	SC	303.4	94.67	94.5	0.17 <
LI CN	34 21 53	79 19 49	100.000 kW	549M	58.8	58.7	
Resort Broadcasters of Dillio					BLH860811KB		
AP229	229A	Wrightsville Beach	NC	54.0	73.05	71.5	1.55 <
APG CN	34 16 53	77 50 01	3.000 kW	100M	45.4	44.4	
Wrightsville Beach Radio Ltd					BPH880519MI 900413		
AP229	229A	Wrightsville Beach	NC	56.9	74.80	71.5	3.30
APD CN	34 15 46	77 47 43	3.000 kW	100M	46.5	44.4	
Praise Broadcasting Network					BPH880519ME 900413		
>Amended 900904-Initial Decision 920625							

AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

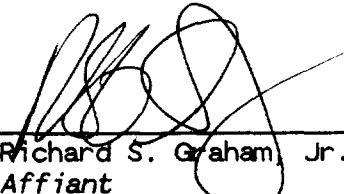
State of Georgia )  
St. Simons Island ) ss:  
County of Glynn )

RICHARD S. GRAHAM, JR. being duly sworn, deposes and says that he is an officer of Bromo Communications, Inc. Bromo has been engaged by Ocean Isle Broadcasting Company to prepare the attached Technical Exhibit.

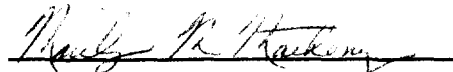
His qualifications are a matter of record before the Federal Communications Commission. He is a graduate of Auburn University and has been active in broadcast engineering since 1972.

The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 19th day of October, 1993.

  
\_\_\_\_\_  
Richard S. Graham, Jr.  
Affiant

Sworn to and subscribed before  
me this the 19th day of October, 1993

  
\_\_\_\_\_  
Notary Public, State of Georgia

My Commission Expires: September 8, 1995